From: Chuck Conrad, President, Chalk Hill Educational Media, Inc.

RE: Docket MM 99-325 (IBOC Digitalization)

Chalk Hill Educational Media is an applicant for a LPFM License. We are very concerned about the possible implementation of IBOC technology on the FM band. Some organizations that are not owners or members of iBiquity, the National Association of Broadcasters and the NAB sponsored NRSC testing organization, may have posed valid negative issues about IBOC. If they are correct, and I think they are, IBOC could destroy radio reception of weaker stations for many Americans. The primary issue is adjacent channel interference which would be especially harmful to low power stations. We have no objection to digital radio, but it should be done within existing bandwidth limitations.

Many other groups have have offered evidence that implementation of In Band On Channel (IBOC) Digitalization could displace both aspiring stations and established stations as well.

Both NPR and M Street newsletter have noted that the public has demonstrated that they want less ads and a greater variety of programming content. At best, IBOC will provide slightly better frequency response. To most listeners, that will be of little significance. They'll probably never hear it in their car or on their clock radio. You can bet they will notice the increased interference this technology will bring to weak and hard to hear stations. The trade off of better fidelity, but fewer listenable programming choices seems to be a bad bargain for the American public.

If any substantial portion of the VCPP, NPR and Amherst Alliance predictions and concerns are correct, we could DECREASE the variety and quality of programming content on the broadcast bands. This is not in the interests of smaller broadcasters or the public interest.

We urge the Commission to proceed with re-investigation of the Eureka-147 alternative Digitalization technology, which would avoid the displacement problem. Eureka 147 would possibly accomplish this by being implemented in the US using the same frequencies as are already used in Canada and Europe, on the L-Band from 1452-1492MHz.

While in 1992, the US Military needed 1452-1492MHz for missile test telemetry, now that the Canadians are transmitting entertainment programming on the L-Band, the military is already coming to agreements with the Canadians to begin protecting those Canadian stations and relinquishing some use of the L-Band.

Furthermore, in December 2001, the FCC announced that in a complete reversal of 1992 decisions. By your own public records the Commission is now reallocating portions of the L-Band for private civilian uses.

It is now politically and technically possible as well as more economically advantageous to re-investigate America joining the rest of the world in using the widely accepted standard for Digital Audio Broadcasting on the L-Band.

While it has been demonstrated by our Canadian and European friends that Eureka-147 technology certainly works, it should first be tested and evaluated as thoroughly as the IBOC technology has been.

In no event should IBOC Digitalization be adopted without full and complete testing and evaluation of the less disruptive Eureka-147 Digitalization technology.

Sincerely,

Chuck Conrad, President
Chalk Hill Educational Media, Inc.